

## **Modern Slavery Statement**

### **Introduction**

This statement outlines Nottingham City Council's actions to address modern slavery and human trafficking within its operations and supply chains during the financial year from April 1, 2024, to March 31, 2025. The Council is committed to preventing these practices and ensuring ethical standards across all activities.

### **Organisational Structure and Supply Chains**

Nottingham City Council, a unitary authority, serves over 300,000 citizens with a wide range of services, both directly and through external contractors. Detailed information on the Council's structure and services is available in Appendix A.

### **Countries of Operation and Supply**

The Council operates solely within the United Kingdom and expects all suppliers to adhere to policies that prevent modern slavery and human trafficking.

### **Responsibility**

The Council is dedicated to eliminating modern slavery and human trafficking in its supply chains and operations. It collaborates with Nottinghamshire Police and other law enforcement agencies, sharing intelligence and participating in joint investigations. The Council also has a First Responder duty to refer potential victims to the National Referral Mechanism (NRM).

### **Policies and Risk Assessments**

The Council has implemented policies and procedures to ensure ethical practices and integrity. Risk assessments are conducted by the Community Protection team, which develops strategies to safeguard against modern slavery.

### **Management Responsibilities**

Managers are required to hold regular supervision meetings with employees to address welfare issues. The Council provides access to a confidential Employee Assistance service, including free counselling.

### **Investigations and Due Diligence**

Suspected incidents of slavery or trafficking are referred to the relevant authorities. The Council's Property Services department monitors for signs of modern slavery on Council property and reports any suspicious activity.

### **Applicable Policies** (copies available upon request):

- **Whistleblowing Policy:** This policy facilitates disclosures without fear of victimisation, discrimination, or disadvantage. It encourages employees and

contractors to report concerns related to the organisation's activities or supply chains, including risks of slavery or human trafficking. Concerns can be raised with managers, the Council's Monitoring Officer, or the Internal Audit Section.

- **Employee Code of Conduct:** This code outlines the expected actions and behaviours of employees, emphasising high standards of conduct and ethical behaviour, particularly in managing the supply chain.
- **Business Charter Policy:** The Nottingham City Council Business Charter promotes collaboration to enhance the city's economic, social, and environmental well-being. Signatories commit to high ethical standards, transparency, staff development, and workforce protection.
- **Construction Charter:** This charter ensures responsible procurement and engagement of construction contractors. It requires signatories and their supply chains to work with trade unions to uphold standards in employment, health and safety, work quality, apprenticeship training, and employment terms.
- **Recruitment Policy:** The organisation recruits employees through East Midlands Shared Services and uses a managed service provider for agency workers, ensuring reputable practices and modern slavery statements. Verification processes are in place for other agency workers and consultants.
- **Commercial and Procurement Strategy 2025-2029:** This strategy aims to deliver economic, social, and environmental benefits through procurement, emphasising ethical standards and minimising social exploitation risks.
- **Equality, Diversity & Inclusion Policies:** These policies demonstrate the Council's commitment to integrating equality, diversity, and inclusion into its operations, eradicating discrimination, and promoting equality in service delivery and employment.
- **Domestic and Sexual Violence Strategy 2021-2030** This strategy, part of the Council's statutory duty, aims to reduce domestic and sexual violence, referencing modern slavery. It includes governance, needs assessment, service commissioning, and strategy development, aligned with the Domestic Abuse Act 2021.

## Joint Working Arrangements

The Council works closely with Nottinghamshire Police and the Gangmasters and Labour Abuse Authority (GLAA). Information on suspected offenses is directed to the appropriate intelligence bureau, and joint operations are conducted regularly.

## Supplier Due Diligence

We are dedicated to conducting thorough due diligence throughout the procurement cycle to mitigate the risks of modern slavery and human trafficking in our supply chain. Our due diligence measures include, where appropriate and feasible:

- Adhering to best practice guidance on modern slavery in the supply chain.
- Implementing steps within the category management approach to mitigate risks, especially in high-risk areas.

- Excluding suppliers with convictions under the Modern Slavery Act 2015 during the selection process.
- Inquiring about methods used by tendering organisations to prevent human rights abuses, including modern slavery, such as supply chain mapping.
- Including clauses in contracts to ensure compliance with the Modern Slavery Act, applicable to subcontractors.
- Collaborating with suppliers to mitigate modern slavery risks and supporting those identifying areas for improvement.
- Monitoring supplier performance against contract requirements and imposing sanctions on those failing to address performance issues or violating contract conditions.

## **Safeguarding Nottingham Citizens**

Nottingham City Council's Adult Health and Social Care division is responsible for safeguarding its most vulnerable citizens. Under the Care Act 2014, the Council must investigate or delegate investigations if an adult is at risk of abuse or neglect. This includes victims of modern slavery and trafficking.

If a citizen's needs do not meet Care Act criteria, support is available through the Slavery Exploitation Team (SET).

Children's Integrated Services adopts a contextual safeguarding approach, recognising risks outside the home, including exploitation and slavery. The Adolescence Service works to prevent and support exit from exploitation.

**Modern Slavery and Child Exploitation:** Modern slavery is a form of organised crime where individuals, including children, are sexually or criminally exploited for criminal gain. Grooming methods often involve promises of a better life, leading to abuse and servitude. Modern slavery is often hidden, with under-reporting a major concern. Children may be exploited by family members without realising it.

**Reporting and Referral:** Modern slavery is child abuse. Any potential victim should be referred to Nottingham City Children's Integrated Services. There is a duty on professionals to refer children or adults as soon as they become aware of a child that may be victim of modern slavery which will be considered by the Front Door of Children's Services/Adult Services. Once verified the Council must notify the Home Office about potential victims through the National Referral Mechanism (NRM). This applies to both children and adults, with specific forms for those seeking support or wishing to remain anonymous.

**Training and Procedures:** The Interagency Safeguarding Children Procedures provide guidance on safeguarding children from modern slavery. The Adult Health and Social Care Training and Development Team ensures clear referral processes via the NRM, with guidance available to all staff. Training includes modern slavery, with bespoke sessions for newly qualified Social Workers. Resources are available on ASK Lion, detailing signs of modern slavery and referral information.

**Multi-Agency Collaboration:** The City Adult Safeguarding Team participates in SERAC meetings and holds Multi-Agency Strategy meetings for modern slavery cases. They

work with citizens and partner agencies, including Police, Health, and Housing, to provide protective options.

### **Slavery Exploitation Team (SET)**

Nottingham's commitment to detecting and preventing modern slavery and exploitation is demonstrated through the Slavery Exploitation Team (SET). Based in Community Safety, SET handles referrals concerning exploitation, collaborating with partners to support victims and reduce harm. The team has developed a referral structure for professionals to report known or suspected cases of exploitation, slavery, or trafficking, and to share information on suspicious activities. SET coordinates and chairs the monthly Slavery Exploitation Risk Assessment Conference (SERAC) meetings, reviewing all referrals and addressing queries from internal and external partners. The team works with partners to establish case backgrounds and develop action plans, sometimes acting as the lead agency, but generally supporting the referring agency. Joint agency visits are conducted to provide a victim-centred approach from the first intervention.

During this reporting period, SET has promoted and communicated issues of exploitation and slavery through presentations and workshops for internal colleagues and external partners. The team has also collaborated with the Safeguarding Adults Board to create briefings on Making Safeguarding Personal and Safer Internet Use. A case study of the Nottingham model is included in the Local Government Act 2022 (LGA) refreshed guidance on Tackling Modern Slavery as an example of best practice.

### **Housing Services**

The City's Housing Services manages circa 24,727 properties across the city and works closely with Nottinghamshire Police and SET from a case management perspective. As part of the multi-agency partnership SERAC, Housing Services proactively tackles modern slavery, building networks within Nottingham to support Council tenants affected by or victims of modern slavery. In 2024/25, the Tenancy and Estate Management Team managed 10 cases of modern slavery and exploitation.

Housing Patch Managers and Area Housing Managers have received modern slavery training, focusing on drugs, gangs, county lines, and exploitation. Housing Services requires all employees to complete compulsory Equality, Diversity, and Inclusion (EDI) training, which includes modules on modern slavery and exploitation, and signposts further e-learning on these topics. Annual compulsory safeguarding training is also provided. The Domestic Abuse Housing Alliance (DAHA) group continues to review training content. The Housing Services Modern Slavery and Exploitation Procedure outlines how Housing Services will respond to reports of modern slavery, support affected tenants and collaborate with partners to address perpetrators.

### **Training and Awareness-Raising**

The Council adopts a multi-agency approach coordinated by the Nottingham and Nottinghamshire Modern Slavery Partnership. The primary training need is to empower frontline workers to be professionally curious and proactive in addressing concerns. As slavery evolves to exploit new opportunities, responses must keep pace. Training and

education on modern slavery and human trafficking are essential for compliance with the Modern Slavery Act 2015.

**E-Learning:** Basic e-learning, including the Protecting People (Safeguarding Awareness) module, is available to all Council colleagues. This training addresses modern slavery as a form of abuse and instructs participants on reporting suspected abuse. Since November 2018, 5,070 colleagues have completed this module. Between April 1, 2024, and March 31, 2025, 173 colleagues completed Safeguarding eLearning. Additionally, since its launch, 884 colleagues have completed the Understanding Modern Slavery e-learning module.

**Collaborative Training:** The Slavery Exploitation Team (SET) has worked with NRM training providers to develop training covering both the NRM and local pathways. Communities Regulation teams have received training on identifying modern slavery. The Council's Housing Licensing schemes, covering approximately 34,000 privately rented properties, have been effective in identifying and disrupting modern slavery. While not all poor housing conditions involve slavery, most cases of slavery include substandard housing.

**Integrated Operations:** Joint efforts between general licensing and environmental health teams enable staff to identify, manage, and refer potential cases during premises visits. Slavery cases have been discovered through housing complaints about unlicensed properties. Labour exploitation has also been identified in licensed premises, beauty treatment establishments, fast food takeaways, and the hospitality industry. Licensing and compliance inspections have uncovered 'beds in sheds' setups.

### **Promoting and Communicating Modern Slavery Issues**

Information outlining our duties, potential warning signs, and actions to take if concerns arise has been made available to all colleagues. This information is accessible on the intranet and supported by an internal communications campaign to raise awareness of modern slavery and its impact on the daily work of Council employees. Additionally, eLearning opportunities were promoted to all colleagues.

### **Declaration**

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes Nottingham City Council's modern slavery and human trafficking statement for the financial year ending 31 March 2025.

**Signed:**



**Sajeeda Rose, Chief Executive**



**(Cllr) Ethan Radford, Portfolio Holder - HR**

**Date:** 29 September 2025



## **APPENDIX A**

### **Nottingham City Council Services**

Nottingham City Council provides services to its citizens and employees through five corporate directorates, in addition to the Chief Executive's Office:

- Adult Social Care and Health
- Children and Education Services
- Communities, Environment, and Resident Services
- Finance and Resources
- Growth and City Development

These include, but are not limited to the following divisions:

#### **Adult Social Care and Health**

- Public Health
- Adult Social Care division:
  - Quality Assurance and Safeguarding
  - Mental Health and Whole Life Disability
  - Social Care Provision – Adults
  - Access and Prevention
- Commissioning and Partnerships division:
  - Commissioning
  - Contracts, Quality and Personalisation
  - Business Strategy, Development and Performance

#### **Children and Education Services**

- Education strategy division:
  - Access to Learning
  - SEND and Vulnerable Pupils
  - Virtual School
  - Sold Services to Schools
  - Nottingham Catering
- Children's Integrated Services division:
  - Children in Care and Care Leavers
  - Children's regulated Services
  - Safeguarding Partnerships and Quality Assurance
  - Children's Social Care
  - Strategy and Improvement
  - Family Help Services
  - First Response (inc. M.A.S.H. Duty and E.D.T. and Extensive & Specialist Services)

#### **Communities, Environment and Resident Services Directorate**

- Community division:
  - Community Protection
  - Environmental Health and Public Protection
  - Community Safety
  - Communities
  - Culture and Libraries

- Tourism and Events
- Sport and Leisure
- Theatre Royal Concert Hall
- Environment and Sustainability division:
  - Midlands NetZero Hub
  - Carbon Reduction Projects & Policy
  - Sustainable Warmth Programmes
  - NetZero Programmes
- Resident Services division:
  - Highways
  - Fleet and Depot Operations
  - Waste and Cleansing Services
  - Green Spaces and Natural Environment
  - District Heating

### **Finance and Resources Directorate**

- Customer Services
  - Service Delivery
  - Customer Access
  - Process Improvement
  - Tenant Experience
  - Nottingham Revenue and Benefits
- Finance
  - Commercial Finance
  - Financial Strategy
  - Transactional Accounting
  - Technical Finance
  - Systems Development
- HR & EDI
  - Directorate Business Partnering
  - Development and Change
  - EDI
  - Organisational HR (Policy, Pay and Reward)
  - HR Systems
  - Pensions
  - Employee Wellbeing
- Legal and Governance
  - Emergency Planning
  - Governance
  - Legal
- Commercial and Procurement
- IT

### **Growth and City Development Directorate**

- Planning and Transport Division:
  - Transport Strategy
  - Parking
  - Planning Strategy and Building Control
  - Traffic and Flood Risk Management
  - Transport Projects and Operations

- Development Management
- Economic Development and Property Division:
  - Economic Development
  - Property
  - Building Services and Facilities Management
- Housing Division:
  - Housing & Regeneration
  - Housing Solutions
  - Housing Services (NCH)

**Chief Executive's office**

- Strategy and Policy division:
  - Analysis and Insight
  - Communications and Marketing
- Major Projects